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10 September 2013

Via Email and Federal Express

Ms. Sharon Fang (3H521), Remedial Project Manager U.S. Environmental Protection Agency – Region III 1650 Arch Street Philadelphia, PA 19103

Subject: Annual Status Report No. 1

Reporting Period: 26 June 2012 to 31 August 2013

Operable Unit 2 North Penn Area 5 (NP5OU2) Superfund Site

Unilateral Administrative Order (UAO) Docket No. CERCLA-03-2012-0205DC

Dear Ms. Fang:

This Annual Status Report (the "Report") is submitted in accordance with Section VI Paragraph 26.d of the Unilateral Administrative Order (UAO) Docket No. CERCLA-03-2012-0205DC dated 26 June 2012 (the "Order"), for the interim remedy for Operable Unit 2 (OU2) of the North Penn Area 5 Superfund Site. The Report summarizes: (1) major milestones achieved in the preceding year (i.e., during the period of 26 June 2012 to 31 August 2013), (2) tasks remaining to be accomplished as part of the Remedial Design (RD), and (3) an updated timeline for the implementation of the remaining work. Per the Order, the Report is due within 30 days following the Effective Date of the Order of 10 August 2012; thus, the Report is due on or before September 10th of each year.

1. MAJOR MILESTONES ACHIEVED IN THE PRECEDING YEAR

Major milestones achieved in the preceding year since the Order was executed on 26 June 2012 through 31 August 2013 are as follows:

- 06/26/2012: Order Executed
- 08/10/2012: Order Effective Date
- 08/15/2012: Geosyntec Consultants, Inc. (Geosyntec) selected by Stabilus as Supervising Contractor and Remedial Design Contractor, and Mr. Derek

Tomlinson, P.E. selected as Project Coordinator.

- 09/14/2012: Quality Management Plan (QMP) submitted to USEPA.
- 10/01/2012: QMP approved by USEPA.

- 10/01/2012: Geosyntec approved by USEPA as Supervising Contractor and Remedial Design Contractor, and Mr. Derek Tomlinson, P.E., approved by USEPA as Project Coordinator.
- 10/11/2012: RD initiation meeting at USEPA Region 3 offices in Philadelphia, PA.
- 11/29/2012: Remedial Design Work Plan (RDWP) submitted to USEPA.
- 01/16/2013: Technical meeting at USEPA Region 3 offices in Philadelphia, PA.
- 01/16/2013: RDWP approved with comments by USEPA.
- 01/29/2013: Revised RDWP submitted to USEPA.
- 03/18/2013: Preliminary (30%) Design Submittal submitted to USEPA.
- 04/25/2013: Technical meeting at USEPA Region 3 offices in Philadelphia, PA.
- 04/25/2013: USEPA provides comments to 30% Design Submittal during Technical Meeting.
- 05/24/2013: Revised 30% Design Submittal submitted to USEPA
- 05/31/2013: USEPA provides approval with comments to Revised 30% Design Submittal
- 06/14/2013: Revised 30% Design Submittal submitted to USEPA.
- 06/03/2013 to 07/10/2013: Pre-Design Investigation (PDI) field activities completed.
- 07/24/2013: 90-day Extension Request for completion of Intermediate (60%) Design Submittal requested.
- 08/08/2013: USEPA provides approval of 90-day Extension Request.
- 08/20/2013: Supplemental PDI Work Plan submitted to USEPA, and revised Figure 1 submitted via email correspondence to USEPA on 08/28/2013.
- 08/29/2013: USEPA provides approval of Supplemental PDI Work Plan and revised Figure 1.

2. TASKS REMAINING TO BE COMPLETED

The tasks remaining to be completed as part of the RD are as follows:

- Enhanced in situ bioaugmentation (EISB) treatability study sampling, analysis and reporting
- Supplemental OU2 overburden groundwater delineation PDI field activities
- Intermediate (60%) Design Submittal
- Performance well installation activities
- Pre-Final (90%) Design Submittal
- Final (100%) Design Submittal

3. UPDATED TIMELINE FOR IMPLEMENTATION OF WORK

A revised RD implementation timeline is included herein and attached hereto as Figure 1. This timeline presents the sequence and anticipated durations of the remaining RD tasks described within the RDWP.

CLOSING

If you have any questions concerning the activities documented in this report or require additional information, please do not hesitate to contact me at (267) 464-2800 or dtomlinson@geosyntec.com.

Sincerely,

Derek W. Tomlinson, P.E.

Project Coordinator

Attachment: Figure 1: Revised Remedial Design Implementation Timeline

cc: Tim Cherry, PADEP (via email & 1 hardcopy first class mail)

M. Joel Bolstein, FoxRothschild

Chris Voci PG, Geosyntec

File: PH0013

FIGURE 1: Remedial Design Implementation Timeline North Penn Area 5 Superfund Site Operable Unit 2 ID Task Name 4th Quarter 1st Quarter 1st Quarter 1 Supervising Contractor / Project Coordinator Approved 0 days 10/1/12 10/1/12 2 Remedial Design Contractor Approved 0 days 10/15/12 10/15/12 3 Monthly Progress Reports 522 days 9/5/12 9/5/14 261 days 7/26/13 7/26/14 29 Annual Status of Work Reports 32 Remedial Design Work Plan (RDWP) 67 days 10/15/12 1/16/13 Prepare Draft RDWF 45 edays 10/15/12 11/29/12 Submit Draft RDWP 0 days 11/29/12 11/29/12 EPA Review 45 edays 11/29/12 1/13/13 Technical Meeting 0 days 1/16/13 1/16/13 EPA RDWP Approval 0 days 1/16/13 1/16/13 38 Preliminary (30%) Design Submittal 97 days 1/16/13 5/31/13 Prepare Draft Report 60 edays 1/16/13 3/17/13 Submit Draft Report 0 days 3/17/13 3/17/13 0 days 4/25/13 4/25/13 Technical Meeting 42 Access Agreement Meeting 0 days 5/9/13 5/9/13 EPA Review 60 edays 3/17/13 5/16/13 44 EPA 30% Design Approval 0 days 5/31/13 5/31/13 45 Pre-Design Investigation (PDI) activities 160 days 6/3/13 1/10/14 Overburden Groundwater Field Activities 60 days 6/3/13 8/23/13 Coordination / Access / Mobilization 5 days 6/3/13 6/7/13 Delineation field activities 15 days 6/10/13 6/28/13 2 days 6/24/13 6/25/13 Surveying locations Well Abandonment 1 day 6/26/13 6/26/13 51 Laboratory analytical results 20 days 7/1/13 52 Data validation 10 days 7/29/13 8/9/13 Data interpretation / reporting 15 days 8/5/13 8/23/13 54 Treatability Study Activities 155 days 6/10/13 1/10/14 6/10/13 6/21/13 Treatability study microcosm construction 10 days 6/24/13 7/5/13 Treatability study microcosm incubation 7/8/13 12/20/13 Treatability study sampling and analysis 6 mons 7/8/13 12/20/13 Treatability study interim results reporting (~30 days) 5 days 8/19/13 8/23/13 Treatability study final results reporting (~150 days) 15 days 12/23/13 1/10/14 Supplemental PDI Work Plan 7 days 8/20/13 8/29/13 Submit Supplemental PDI Work Plan 0 days 8/20/13 8/20/13 63 EPA Review 5 days 8/20/13 8/26/13 0 days 8/29/13 8/29/13 EPA Approval 65 70 days 8/20/13 11/25/13 10 days 8/20/13 9/2/13 Coordination / Access / Mobilization Delineation field activities 5 days 9/3/13 9/9/13 5 days 9/10/13 9/16/13 Surveying locations Laboratory analytical results 20 days 9/10/13 10/7/13 10/8/13 10/21/13 Data validation 10 days 25 days 10/22/13 11/25/13 72 Intermediate (60%) Design Submittal 171 days 5/31/13 1/26/14 *****------73 Prepare Draft Report 180 edays 5/31/13 11/27/13 Submit Draft Report 0 days 11/27/13 11/27/13 1/11 Technical Meeting 45 edays 11/27/13 1/11/14 EPA Review 60 edays 11/27/13 1/26/14 EPA Intermediate Design Approval 0 days 1/26/14 1/26/14 1/27/14 78 Performance well installation activities (Tentative) 90 days 5/30/14 Coordination / Access / Mobilization 10 days 1/27/14 2/7/14 1. The start/finish dates on this figure are provided for informational purposes only. The deadlines for the work required under the Remedial Design Work Plan (RDWP) that are enforceable as part of the schedule Well installation activities 60 days 2/10/14 5/2/14 required under the Unilateral Administrative Order (UAO) are those set forth in Paragraph 25(b) of the UAO, Packer testing / geophysical testing 50 days 2/24/14 5/2/14 as may be modified in writing by EPA under Paragraph 118 of the UAO. 0 days 5/2/14 5/2/14 Well construction technical meeting 2. edays within the duration is for elapsed days. The edays unit is used for USEPA deadlines based on exact number of calendar days rather than the days unit which is for business days. Well construction / completion 10 days 5/5/14 5/16/14 3. Overburden Groundwater Field Activities required additional time as OU2 overburden groundwater was Performance well installation summary report 5/12/14 15 days not delineated during the PDI work effort. Extension of submittal of the Intermediate (60%) Design submittal 85 Pre-Final (90%) Design Submittal 107 days 1/26/14 6/25/14 was granted by USEPA in letter dated 8 August 2013 to allow for the completion of Supplemental PDI field activities. Overburden groundwater delineation results from the PDI and Supplemental PDI field activities will be provided in the Intermediate (60%) Design submittal. Prepare Draft Report 90 edays 1/26/14 Submit Draft Report (include treatability study final results) 0 days 4/26/14 4/26/14 Technical Meeting 45 edays 4/26/14 6/10/14 EPA Review 60 edays 4/26/14 6/25/14 EPA Comments 6/25/14 6/25/14 0 days 91 Final (100%) Design Submitta 64 days 6/25/14 9/23/14 30 edays 6/25/14 7/25/14 7/25/14 7/25/14 Submit Final Report 0 days EPA Review 60 edays 7/25/14 9/23/14 0 days 9/23/14 9/23/14 EPA Final Design Approval Milestone Е Manual Task Deadline Project: 2012_1130_NP5OU2_Ge Project Summary Manual Summary Rollup = Date: 9/4/13 Duration-only Summary External Tasks Progress Page 1